

REMARKS

In the Office Action, the Examiner rejected claims 1-29. By this paper, the Applicants amend claims 1, 10, 17, and 21 for clarification of certain features to expedite allowance of the present application. These amendments do not add any new matter. Upon entry of these amendments, claims 1-29 will be pending in the present application and are believed to be in condition for allowance. In view of the foregoing amendments and the following remarks, Applicants respectfully request reconsideration and allowance of all pending claims.

Claim Rejections under 35 U.S.C. § 102

In the Office Action, the Examiner rejected claims 1-29 under 35 U.S.C. § 102(b) as being anticipated by Spencer et al., Installing and Configuring Active Directory, Prentice Hall PTR, pages 1-33, hereafter referred to as “the Spencer reference.” Applicants respectfully traverse this rejection.

Legal Precedent

On a preliminary note, Applicants stress that the Examiner’s rejections are vague regarding the various claim features and, thus, the Applicants remind the Examiner that:

When a reference is complex or shows or describes inventions other than that claimed by the applicant, *the particular part relied on must be designated as nearly as practicable*. The pertinence of each reference, if not apparent, must be clearly explained and *each rejected claim specified*.

37 C.F.R. § 1.104(c)2 (emphasis added); see also M.P.E.P. § 707.07.

In the Office Action, it appears that the Examiner has merely summarized portions of the cited reference without providing any specific citations to the reference and without specifically correlating the reference to elements of the present claims. Applicants believe that this is entirely inadequate to fulfill the Examiner’s obligations

under 37. C.F.R. § 1.104(c)(2). As such, Applicants believe the rejection provided by the Examiner to be deficient on its face. Accordingly, Applicants request that if the Examiner maintains the rejection, a clear explanation of the features of the reference relied on, correlated to the particular features of the claim(s) rejected, be provided.

Anticipation under 35 U.S.C. § 102 can be found only if a single reference shows exactly what is claimed. *Titanium Metals Corp. v. Banner*, 778 F.2d 775, 227 U.S.P.Q. 773 (Fed. Cir. 1985). For a prior art reference to anticipate under 35 U.S.C. § 102, every element of the claimed invention must be identically shown in a single reference. *In re Bond*, 910 F.2d 831, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990). To maintain a proper rejection under 35 U.S.C. § 102, a single reference must teach each and every limitation of the rejected claim. *Atlas Powder v. E.I. du Pont*, 750 F.2d 1569 (Fed. Cir. 1984). Accordingly, Applicants need only point to a single element not found in the cited reference to demonstrate that the cited reference fails to anticipate the claimed subject matter.

Omitted Features of the Pending Claims

Turning to the claims, amended independent claim 1 recites, *inter alia*:

A method of remote control for a networked device, comprising ... providing a plurality of device control features for the networked device in the directory server, wherein the plurality of device control features include a first feature for *configuring parameters of the networked device directly from the directory server* and a second feature for *executing a control task at the networked device directly from the director server*; and controlling access to the device control feature *through the directory server* based on the user logins and different access rights for the plurality of authorized users.

(Emphasis added)

In contrast, the Examiner states the following, which Applicants believe the Examiner may have intended to correspond to the features of claim 1 set forth above:

[A] user request for printing to a particular printer would go to the print server/a networked device/a headless server. The print server would request the Active Directory Server for the print server controls of the user print request (i.e., server controls are information that is required by the print server and the print server administrator can store any relevant information including server controls or configuration information that is required to print, in the print server schema object provided that the administrator has the proper authorization. The detail listing of the parameter/features/information is nonfunctional descriptive data, which is configurable by the administrator and also depend on the particular device e.g., a print server.

Office Action, page 5, lines 6-13.

Applicants respectfully assert that there are at least three distinctions between the features of claim 1 and the cited reference. First, in contrast to the apparent assertions of the Examiner, the printer of the Spencer reference is not equivalent to the recited networked device. Second, the Spencer reference does not include any concept of causing execution of a control task or causing an action to be taken directly from a directory server. Third, while the Spencer reference apparently includes a discussion of security and access control on a printer object, the security for the printer object is not in the directory service, as set forth by claim 1.

Regarding the first distinction set forth above, the printer of the Spencer reference is clearly not equivalent to the presently recited "networked device." Applicants respectfully remind the Examiner that during patent examination, the pending claims must be given their broadest *reasonable* interpretation *consistent* with the specification. *See In re Prater*, 415 F.2d 1393, 1404-05, 162 U.S.P.Q. 541, 550-51 (C.C.P.A. 1969); *see also In re Morris*, 127 F.3d 1048, 1054-55, 44 U.S.P.Q.2d 1023, 1027-28 (Fed. Cir. 1997); *see also* M.P.E.P. §§ 608.01(o) and 2111. Indeed, the specification is "the primary basis for construing the claims." *See Phillips v. AWH Corp.*, No. 03-1269, -1286, at 13-16 (Fed. Cir. July 12, 2005) (*en banc*). The printer of the Spencer reference is directly attached to a computer, which is acting as a print

server. The Spencer reference does not teach that the printer directly interacts with a directory. While the directory in the Spencer reference is apparently being used to store information relating to the printer, the printer itself is not accessing the directory. Accordingly, Applicants stress that the printer of the Spencer reference is not equivalent to the recited networked device.

Regarding the second distinction set forth above, the Spencer reference fails to teach “a first feature for configuring parameters of the networked device directly from the directory server and a second feature for executing a control task at the networked device directly from the directory server,” as set forth in amended independent claim 1. For example, embodiments of the present invention have the ability to issue a command to actually implement an action from a directory. In a specific example, a user could find a server icon on a directory, right click the server icon, and reboot the represented server by clicking a selection on a pop-up menu. In contrast, the Spencer reference fails to teach any concept of a task or action to be implemented from a directory. For example, when the Spencer reference refers to managing devices (e.g., printers), the term “management,” taken in context, merely refers to the ability to discover and track devices. While the information stored on the printer object of the Spencer reference apparently includes driver information and properties (e.g., printer properties), which help the computers on the network discover and install proper drivers, the directory of the Spencer reference does not impact or provide meaning to the device (e.g., printer) itself. In other words, the directory service of the Spencer reference is not the authoritative source of the configuration information. Indeed, it is merely collecting the information for informational purposes. Accordingly, the Spencer reference fails anticipate “configuring parameters of the networked device ... and ... executing a control task at the networked device directly from the directory server,” as presently recited in claim 1.

Regarding the third distinction set forth above, the Spencer reference fails to teach “controlling access to the device control feature through the directory server,” as presently recited in claim 1. Indeed, while the Spencer reference apparently

contemplates security and access control on a printer object, these security controls are not present in a directory server.

The Examiner rejected claims 1, 10, 17 and 22 as a group and further asserted that “[a]s to claims 2-9, 11-16, 18-20 and 23-29, the limitations of these claims are either rejected or addressed in the rejected claims above.” Office Action, page 6, lines 16-17. The Examiner failed to provide any detailed rejection of independent claim 21 whatsoever. Applicants respectfully remind the Examiner that “[a] plurality of claims should never be grouped together in a common rejection, unless that rejection is equally applicable to all claims in the group.” M.P.E.P. § 707.07(d). Applicants assert that the Examiner improperly expressed the rejection by inappropriately grouping the claims together and has completely failed to address independent claim 21.

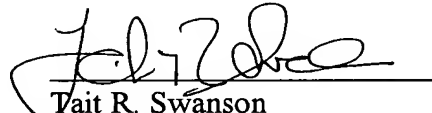
Applicants assert that independent claim 1 and the claims depending therefrom are currently in condition for allowance in view of the clarifying amendments and arguments set forth above. Furthermore, Applicants assert that the cited reference fails to disclose “transmitting directly from the directory server to the managed server a control task generated by the remote client,” as recited in independent claim 10. Additionally, the cited reference fails to disclose “a device management system ... adapted to configure and control ... networked devices directly from the directory server,” as recited in independent claim 17. Further still, the cited reference fails to disclose “transmitting data for the task to the remote networked device directly from the directory server to the remote networked device,” as recited in independent claim 21. Although these features have not been addressed by the Examiner, in as much as these features correspond to the arguments set forth above, Applicants assert that claims 10, 17, and 21 are allowable over the cited reference. Indeed, in view of the deficiencies in the Spencer reference set forth above, Applicants assert that it cannot anticipate independent claims 1, 10, 17, and 21, and their respective dependent claims. Accordingly, Applicants respectfully request allowance of claims 1-29.

Conclusion

The Applicants respectfully submit that all pending claims should be in condition for allowance. However, if the Examiner believes certain amendments are necessary to clarify the present claims or if the Examiner wishes to resolve any other issues by way of a telephone conference, the Examiner is kindly invited to contact the undersigned attorney at the telephone number indicated below.

Respectfully submitted,

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